

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDREI STEPHANOVICH
BORGHERIU,

Defendant.

No. 4:22-CR-06040-MKD-1

DEFENDANT'S SPEEDY TRIAL
WAIVER AND STATEMENT OF
REASONS IN SUPPORT OF THE
MOTION TO CONTINUE TRIAL
DATE

My attorney has advised me of my right under the Speedy Trial Act, 18 U.S.C. § 3161, to go to trial within seventy (70) days after the Indictment was filed or my arrest, whichever was later. My attorney has also advised me that a continuance of the trial is needed and we have discussed the reasons for the continuance. A motion to continue the trial date has been or will be filed. I ask this Court to grant the motion and reset the trial from its current date of February 13, 2023, to a date no later than October 9, 2023, for the following reasons pursuant to 18 U.S.C. § 3161:

DEFENDANT'S SPEEDY TRIAL WAIVER AND STATEMENT OF REASONS
IN SUPPORT OF THE MOTION TO CONTINUE TRIAL DATE - 1

1 Additional discovery is needed, as is time to
2 prepare pretrial motions and to be ready for trial.
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9 I understand that if the Court grants the motion to continue, all time between
10 the date the motion was filed and the new trial date will be excluded from the
11 speedy trial calculations pursuant to the Speedy Trial Act.

12 I declare under penalty of perjury that the foregoing is true and correct.

13 
14 Defendant

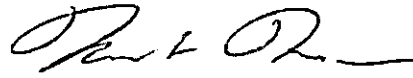
15 Date: 01-26-2023

16 I have read this form and discussed its contents with my client.

17 
18 Counsel for Defendant

19 Date: 26 January 2023
20

1 I have translated this form into a language in which the Defendant is
2 conversant. If questions have arisen, I have notified the Defendant's counsel of the
3 questions and have not offered any advice or personal opinions.

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5 _____
6 Interpreter

7 Date: January 26, 2023
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